

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

THE CITY OF URBANA, THE CITY OF)
CHAMPAIGN, and the COUNTY OF)
CHAMPAIGN, ILLINOIS, all Municipal)
Corporations, bodies politic and corporate, in)
Champaign County, Illinois,)
Joint Petitioners,)

v.)

Docket No. T11-0134

ILLINOIS CENTRAL RAILROAD COMPANY,)
and the ILLINOIS DEPARTMENT OF)
TRANSPORTATION,)
Respondents.)

Joint Petition for an Order of the Illinois Commerce)
Commission regarding a separation of grades and)
an authorization for the construction of a highway)
bridge over the Illinois Central Railroad Company)
railroad tracks (MP 124.70) at the tracks')
intersection with the Olympian Drive Extension in)
Champaign County, Illinois, an apportionment of)
costs thereof, including directing payment to be)
borne by the Grade Crossing Protection Fund, and)
other stated or requested relief.)

INTERROGATORIES

NOW COME the Joint Petitioners, The City of Urbana, The City of Champaign, and the County of Champaign, Illinois, by and through their attorney Jon K. Ellis, pursuant to Section 200.360(c) of the Rules of Practice (83 Ill.Admin.Code Part 200) of the Illinois Commerce Commission and propound the following Interrogatories to the Intervenor *Preserve Olympian Farmland* to be answered in the fullest detail possible under oath pursuant to the time frame established by the Administrative Law Judge at the April 17, 2013 Hearing of this Matter:

Interrogatory No. 1: State the name of the person answering these Interrogatories.

Answer:

Interrogatory No. 2: As pertains to the Intervenor's Report titled "*Bridge to Nowhere: The Proposed Extension of Olympian Drive in Champaign County*" dated March, 2013, and by referencing the Table of Contents contained therein on page 2, identify the parts of this Report authored solely by Dr. David Wilson.

Answer:

Interrogatory No. 3: As pertains to the Intervenor's Report titled "*Bridge to Nowhere: The Proposed Extension of Olympian Drive in Champaign County*" dated March, 2013, and by referencing the Table of Contents contained therein on page 2, identify the parts of this Report authored by Dr. David Wilson after collaboration with another person or persons, and please state the name or names of such other person or persons.

Answer:

Interrogatory No. 4: As pertains to the Intervenor's Report titled "*Bridge to Nowhere: The Proposed Extension of Olympian Drive in Champaign County*" dated March, 2013, state the name of any person who provided information, documents, photographs, books, reports, writings, publications or any other material to Dr. David Wilson that Dr. David Wilson then used or relied upon to author this Report.

Answer:

Interrogatory No. 5: As pertains to the Intervenor's Report titled "*Bridge to Nowhere: The Proposed Extension of Olympian Drive in Champaign County*" dated March, 2013, identify the information, documents, photographs, books, reports, writings, publications or any other material provided to Dr. David Wilson that Dr. David Wilson then used or relied upon to author this Report.

Answer:

ATTESTATION

STATE OF ILLINOIS)
) ss.
COUNTY OF _____)

_____, being first duly sworn on oath, deposes and states that
__he has read the foregoing document, and the answers made herein are true, correct and
complete to the best of ___ knowledge and belief.

Subscribed and Sworn To before me this
_____ day of _____, 2013

Notary Public

Respectfully submitted,

The City of Urbana, The City of Champaign,
and the County of Champaign, Illinois, Joint
Petitioners

By: /s/ Jon K. Ellis

Jon K. Ellis

Attorney for Joint Petitioners

1035 South 2nd Street

Springfield, IL 62704

(217) 528-6835

(217) 528-6837 (facsimile)

jon@jkellislaw.com

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

THE CITY OF URBANA, THE CITY OF)
CHAMPAIGN, and the COUNTY OF)
CHAMPAIGN, ILLINOIS, all Municipal)
Corporations, bodies politic and corporate, in)
Champaign County, Illinois,)
Joint Petitioners,)
v.)
ILLINOIS CENTRAL RAILROAD COMPANY,)
and the ILLINOIS DEPARTMENT OF)
TRANSPORTATION,)
Respondents.)
)

Docket No. T11-0134

Joint Petition for an Order of the Illinois Commerce Commission regarding a separation of grades and an authorization for the construction of a highway bridge over the Illinois Central Railroad Company railroad tracks (MP 124.70) at the tracks' intersection with the Olympian Drive Extension in Champaign County, Illinois, an apportionment of costs thereof, including directing payment to be borne by the Grade Crossing Protection Fund, and other stated or requested relief.

NOTICE OF FILING

TO ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that the Joint Petitioners have filed their Interrogatories in the above-captioned Matter with the Illinois Commerce Commission on April 19, 2013. A copy of the aforementioned Interrogatories has been e-mailed to each of the individuals listed on the attached Certificate of Service.

Respectfully submitted,

The City of Urbana, The City of Champaign,
and the County of Champaign, Illinois, Joint
Petitioners

By: /s/ Jon K. Ellis

Jon K. Ellis
Attorney for Joint Petitioners
1035 South 2nd Street
Springfield, IL 62704
(217) 528-6835
(217) 528-6837 (facsimile)
jon@jkellislaw.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing Joint Petitioners' Interrogatories was made, in addition to electronic filing with the Illinois Commerce Commission, by e-mailing a true and accurate copy thereof to:

Joseph VonDeBur
Railroad Safety Specialist
Transportation - Railroad
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
jvondebu@icc.illinois.gov

Lance T. Jones
Deputy Chief Counsel
Illinois Department of Transportation
2300 South Dirksen Parkway
Suite 313
Springfield, Illinois 62764
lance.jones@illinois.gov

Christine Reed
ATTN: Jason Johnson
2300 South Dirksen Parkway
Springfield, Illinois 62764
jason.johnson@illinois.gov

Arne Skrodal
Signal Planning Engineer
CN/Illinois Central Railroad Company
17641 South Ashland Avenue
Homewood, Illinois 60430-1345
arne.skrodal@cn.ca

Laurel Prussing
Mayor, City of Urbana
400 South Vine Street
Urbana, Illinois 61801-0219
jaross@urbanailinois.us

Don Gerard
Mayor, City of Champaign
102 North Neil Street
Champaign, Illinois 61820-4018
MayorGerard@ci.champaign.il.us

Edward D. McNamara, Jr.
Joseph H. O'Brien
McNamara & Evans
931 South 4th Street
P.O. Box 5039
Springfield, Illinois 62705
mcnamara.evans@gmail.com

James Simon
City Attorney
City of Urbana Legal Division
400 South Vine Street
Urbana, Illinois 61801
jlsimon@urbanailinois.us

Jennifer R. Kuntz
Assistant Chief Counsel
Illinois Department of Transportation
2300 South Dirksen Parkway
Springfield, Illinois 62764
jennifer.kuntz@illinois.gov

Thomas J. Healey
Counsel - Regulatory
CN/Illinois Central Railroad Company
17641 South Ashland Avenue
Homewood, Illinois 60430
tom.healey@cn.ca

Patrick Jones
Manager, Public Works
CN/Illinois Central Railroad
17641 South Ashland Avenue
Homewood, Illinois 60430
patrick.jones@cn.ca

Jeff Blue
Champaign County Highway Engineer
Brookens Administrative Center
1605 East Main Street
Urbana, Illinois 61802
jblue@co.champaign.il.us

Joseph E. Hooker
Assistant City Attorney
City of Champaign
182 North Neil Street
Champaign, Illinois 61820
joseph.hooker@ci.champaign.il.us

to each of their respective e-mail addresses listed above, on April 19, 2013.

/s/ Jon K. Ellis
Jon K. Ellis